## THE LAW FIRM OF

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BY APPOINTMENT ONLY

July 2, 2012

## Via ECF

Hon. Steven M. Gold United States Chief Magistrate Judge United States District Court, Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Patrick Alford, et al v. The City of New York.

Docket Number: CV 11-01583

Rodriguez v. The City of New York
Docket Number: CV 10-04661

Dear Judge Gold:

This office represents plaintiffs Patrick Alford, Sr., and J.A. with regard to the above referenced matters. I write to advise Your Honor of the issues to be addressed at the conference scheduled for July 6<sup>th</sup>, 2012 at 11:30am.

To date, we have begun five separate depositions in this case, to wit: plaintiff, Jennifer Rodriguez; plaintiff, Patrick Alford, Sr.; defendant Carlene Anderson (Saint Vincent's Services); defendant Robert Salemi (NYC); and defendant John McLaughlin (NYC).

Mr. Alford's deposition was begun on July 2<sup>nd</sup>, 2012 at 2:00 pm but was not concluded because he required pain medication and it quickly became apparent that the medication impaired his ability to answer questions. Thus, we will need to re-schedule the balance of his deposition, at a date in the future after he has recouperated. We also need to schedule the continued deposition of each of the other four witnesses.

Respectfully,

James R. Lambert

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